

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:	§	Chapter 11
	§	
LOCKWOOD HOLDINGS, INC., et al.,	§	Case No. 18-30197 (DRJ)
	§	
Debtors.	§	Jointly Administered

**NOTICE OF APPEARANCE, REQUEST FOR  
SERVICE OF PAPERS AND RESERVATION OF RIGHTS**

**PLEASE TAKE NOTICE** that, pursuant to Section 1109(b) of Title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the “Bankruptcy Code”) and Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), LeClairRyan, a Professional Corporation, hereby enters its appearance on behalf of Pusan Pipe America, Inc. d/b/a SeAH Steel America, Inc. (“SeAH”) and requests that all notices given or required to be given and all papers served in this case be delivered to and served upon the party identified below at the following address:

Jason M. Medley, Esq.  
LECLAIRRYAN, A PROFESSIONAL CORPORATION  
1233 West Loop South, Suite 1000  
Houston, Texas 77027  
Telephone: (713) 752-8317  
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**PLEASE TAKE FURTHER NOTICE** that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand not only includes notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all notices, orders, pleadings, motions, applications, complaints, demands, hearings, request, answers, replies, memoranda and briefs in support of any of the above, whether formal or informal, transmitted or

conveyed by electronic delivery, mail delivery, telephone, facsimile or otherwise, in this case.

**PLEASE TAKE FURTHER NOTICE** that this notice of appearance, and any subsequent appearance, pleading, claim, or suit, is not intended, nor shall be deemed, to waive SeAH's: (i) right to contest the subject matter or personal jurisdiction of this Court; (ii) right to seek abstention or withdrawal of any matter arising in this proceeding; (iii) right to have final orders in non-core matters entered only after de novo review by a United States District Court Judge; (iv) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (v) right to have the reference withdrawn by a United States District Court Judge in any matter subject to mandatory or discretionary withdrawal; (vi) right to enforce any contractual provisions with respect to arbitration; or (vii) other rights, claims, actions, defenses, setoffs or recoupments to which SeAH is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

**PLEASE TAKE FURTHER NOTICE** that this appearance is a limited appearance for purposes of notice only. Accordingly, this Notice of Appearance is not to be construed as a waiver of any rights, including, without limitation, the right to contest jurisdiction or service of process or to demand trial by jury of any issue.

Dated: February 7, 2018

**LeClairRyan, a Professional Corporation**

/s/ Jason M. Medley

Jason M. Medley

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*Attorneys for Pusan Pipe America, Inc.*

*d/b/a SeAH Steel America, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on February 7, 2018, I caused the attached Notice of Appearance and Demand for Service of Papers to be electronically filed with the Clerk, United States Bankruptcy Court, Southern District of Texas, by ECF and a true and correct copy of the foregoing was served upon the parties who have requested e-notice, via the CM/ECF electronic notice system.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.

Dated: February 7, 2018

By: /s/ Jason M. Medley  
Jason M. Medley